

The Honorable Robert S. Lasnik

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NORTHWEST ENVIRONMENTAL ADVOCATES,
an Oregon non-profit corporation,

Plaintiff,

v.

UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY, an agency of the United
States of America,

Defendant.

Case No. 2:19-cv-00887-RSL

JOINT MOTION FOR ENTRY OF
ORDER SETTING DEADLINES

Plaintiff Northwest Environmental Advocates (“NWEA”) and Defendant United States Environmental Protection Agency (“EPA”) hereby jointly move for entry of an order to guide this case brought under the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”), concerning a FOIA request that NWEA submitted to EPA on September 13, 2017 (“FOIA Request”). In support of this motion, the parties state as follows:

1. The parties have conferred and agree that entry of an agreed order setting forth the below schedule will facilitate settlement of this matter and minimize the parties’ costs and the burdens on the Court.

2. Accordingly, the parties hereby stipulate to and request entry of an order

1 establishing the following deadlines:

- 2 a. By March 31, 2020, Defendant shall complete a supplemental search for
3 potentially responsive records and release to Plaintiff any responsive
4 records discovered and provide Plaintiff with an updated Index of
5 Redacted or Entirely Withheld Records;
- 6 b. By April 22, 2020, for each record withheld in full or in part on the basis
7 of the deliberative process privilege (Exemption 5), Defendant shall
8 provide Plaintiff with an explanation for the withholding.
- 9 c. By May 6, 2020, the Parties will submit a Joint Status Report to the Court
10 notifying the Court of any remaining issues in the litigation.
- 11 3. The parties are submitting a proposed order with this stipulated motion.
- 12

13 Respectfully submitted this 31st day of January 2020.

14 s/ Lia Comerford

15 Lia Comerford, Oregon State Bar # OR141513

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CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2020, I electronically filed the foregoing JOINT MOTION FOR ENTRY OF ORDER SETTING DEADLINES and this Certificate of Service with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the attorneys of record.

s/ Lia Comerford
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